REMARKS

Claims 11-26, as amended, remain herein.

1. Claims 11-13, 15, and 17-26 were rejected under 35 U.S.C. § 102(e) over Balassanian U.S. Patent Application Publication 2005/0021857.

Applicants discovered, *inter alia*, routing techniques for appliances in a home bus network comprising a plurality of networks (*e.g.*, Networks A-D of Fig. 3). Consider, for example, Appliance 1 of Network C. In a conventional networking architecture, network devices employ either static routing or dynamic routing. When static routing is used, packets for a destination on the same network are routed directly, and packets for a destination on another network are routed based on the contents of the routing table. If no specific route is available, then a default route may be used. Thus, packets from Appliance 1 to Appliance 2 would be routed directly; however, packets from Appliance 1 to Appliance 1 on Network B would be routed through Appliance 3.

When dynamic routing is used, routing protocols (e.g., RIP, OSPF, and the like) are used to distribute routing information. When multiple routers are included on the same subnet, those routes are distributed and used to propagate routing tables. For example, on appliances on Network C would receive routes through Appliance 4 to Networks A, B, and D, and through Appliance 5 to networks not shown.

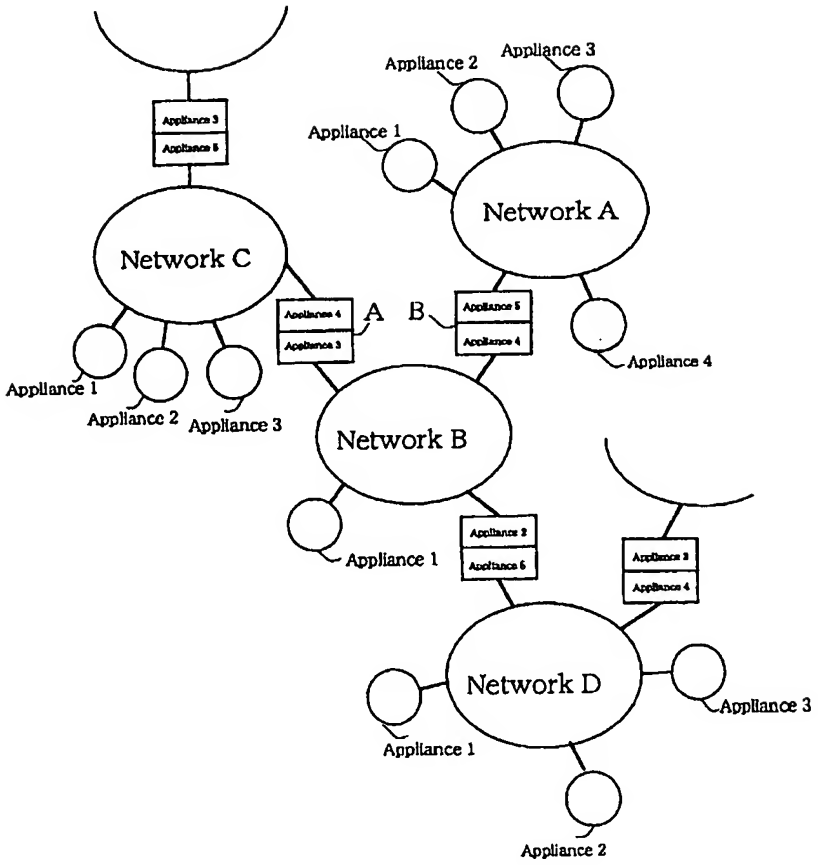
Applicants claim a method of transmitting data in a home bus system that is different from conventional static or dynamic routing techniques. In a home bus system having

multiple networks, a particular router is predetermined among multiple routers connected to the network. All packets destined for a device on another network are transmitted through a predetermined router. This is fundamentally different than using a default route in an Internet Protocol network.

A default route is route to be used if no other route exists. For example, in Fig. 3, if Appliance 1 of Network C had no route to Network B, then it could use a default route (e.g., through Appliance 5). However, when there is a route from Network C to Network B, the default route would not be used, and the packets would instead be routed through the available route (*e.g.*, Appliance 4).

All Balassanian discloses is the use of a default route. Referring to Fig. 1b of Balassanian, in the case where WAN 160 is the first network and LAN 195 is a network other than the first network, a transmitting terminal A connected to the first network 160 transmits data to Gateway Interface 165. On the other hand, referring to Fig. 1a of Balassian, when the transmitting terminal A transmits data to LAN 150, which is a network other than the first network, the transmitting terminal A should transmit the data to Gateway Interface 155, not Gateway Interface 165. Thus, as applicants presently understand Balassanian, when the transmitting terminal transmits data to a network other than the network to which the transmitting terminal is connected, the routers 150 and 165 are used separately. This is quite different from the present invention.

Fig. 3



Applicants disclose a home bus system in which terminals transmitting data to other networks always initially transmit data to a predetermined router existing in the same network (see pg. 14, lns. 14-16 of Applicants' specification). The transmitting terminal has to determine only whether the destination network is another network, thereby reducing routing complexity for the transmitting terminal. This technique is clearly different than the use of a default route as described by Balassanian.

Furthermore, Balassanian discloses techniques for routing media from a source appliance to a destination appliance across a network. However, Balassanian fails to disclose a plurality of networks in a home bus system, much less the routing techniques claimed by applicants.

Thus, Balassanian does not disclose all elements of applicants' claimed invention and therefore is not a proper basis for a rejection under § 102. Nor does Balassanian suggest applicants' claimed invention. Accordingly, claims 11-13, 15, and 17-26 are not anticipated by Balassanian, and applicants request withdrawal of this ground of rejection, and allowance of all of those claims.

2. Claims 14 and 16 were rejected under 35 U.S.C. § 103(a) over Balassanian in view of Teraoka U.S. Patent 6,292,836.

As explained above herein, there is no disclosure or teaching in Balassanian that discloses or suggests applicants' claimed invention. Teraoka discloses using virtual network addresses embedded in conventional Internet Protocol packets. Teraoka fails to provide what is missing from Balassanian. Thus, there is no disclosure in Balassanian or Teraoka that would have suggested applicants' claimed invention to one of ordinary skill in this art. Accordingly, applicants respectfully request reconsideration and withdrawal of this rejection, and allowance of claims 11-26.

Accordingly, this application is now fully in condition for allowance and a notice to that effect is respectfully requested. The PTO is hereby authorized to charge/credit any fee deficiencies or overpayments to Deposit Account No. 19-4293 (Order No. 28951.3123 C1). If further amendments would place this application in even better condition for issue, the Examiner is invited to call applicants' undersigned attorney at the number listed below.

Respectfully submitted,

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